

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

1530 MAIN, L.P.  
D/B/A THE JOULE,

*Plaintiff,*

v.

KAIROI MANAGEMENT, LLC, *et al.*,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Case No. 3:22-cv-245N

**PLAINTIFF'S NOTICE OF DISMISSAL**

Pursuant to a settlement agreement between the parties, Plaintiff 1530 Main, L.P. d/b/a The Joule files this Notice of Dismissal without prejudice under Fed. Rule Civ. P. 41(a)(1)(A). None of the Defendants have filed an answer of a motion for summary judgment. Plaintiff requests the Court to dismiss its suit against all Defendants without prejudice to refiling.

Dated: March 11, 2022

Respectfully submitted,

**SCHEEF & STONE, LLP**

/s/ Robin L. Barnes

Robin L. Barnes

Texas Bar No. 24009952

[Robin.barnes@solidcounsel.com](mailto:Robin.barnes@solidcounsel.com)

500 North Akard Street, Ste. 2700

Dallas, Texas 75201

T: (214) 706-4200

F: (214) 706-4242

A. Becca Skupin

Texas Bar No. 24084272

[Becca.skupin@solidcounsel.com](mailto:Becca.skupin@solidcounsel.com)

200 N. Travis St., Ste. 402

Sherman, Texas 75090

(430) 262-5660

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2022, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas – Dallas Division using the electronic case filing system of the Court and that a true and correct copy of this document was served on the attorneys for Defendants by email at the email address indicated below:

Marko Zoretic  
Knobbe Martens  
2040 Main St., 14<sup>th</sup> Fl.  
Irvine, CA 92614  
[Marko.zoretic@knobbe.com](mailto:Marko.zoretic@knobbe.com)

Connie Arambula  
Kairoi Management, LLC  
711 Navarro Street, Suite 400  
San Antonio, TX 78205  
[carambula@kairoi.com](mailto:carambula@kairoi.com)

/s/ Robin L. Barnes  
**ROBIN L. BARNES**